REMARKS

Claims 1-16 were pending at the time of examination. No claims have been cancelled. Claims 1, 4-6, 9 and 15 have been amended. The applicants respectfully request reconsideration based on the foregoing amendments and these remarks.

Objections to the Specification

The Examiner objected to the specification because page 4, line 20, refers to an "interchange network 150" which the Examiner claims is not shown in FIG. 1. The applicants have submitted a replacement FIG. 1, in which the reference numeral 150 has been added to the "message interchange network" box.

The applicants believe that the specification is now in agreement with the drawings and submit that all the objections to the specification be removed.

Claim Rejections – 35 U.S.C. § 112

Claims 1-9 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. In particular, the Examiner noted that terms ending in 'able' should be avoided in the claim 1 and 9 "because these terms lead to uncertainty of whether anything actually occurs (or result)" (Office Action, page 3, lines 1-3). The applicants have amended claims 1 and 9 to no longer recited terms ending in "able" and respectfully submit that the rejection under 35 U.S.C. § 112, second paragraph, is moot and should be withdrawn.

Claim Rejections – 35 U.S.C. § 102

Claims 1-14 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,704,768 to Zombek et al. (hereinafter Zombek). The applicants respectfully traverse the rejection for the following reasons.

The applicants' invention relates to a system and method for enabling the interchange of enterprise data through an open platform. The open platform can be based on a standardized interface that enables parties to easily connect to and use the network. Services operating as senders, recipients and in-transit parties can leverage a framework that overlays a public network (Abstract).

Zombek, on the other hand, is directed to a system, method and computer program product for providing server discovery services during a startup sequence. More specifically,

Zombek discloses a system for communicating messages in a client-server environment over one or more wireless networks that can support different network protocols.

Turning now to the specific rejections of the claims, claim 1 is directed to a method for routing a message between a first service and a second service in a message routing network. Step (b) of claim 1, as amended, recites "receiving, from a second service, a message including said identifier, said message being directed to a mapped service, wherein said mapped service is an entity account-specific representation of said first service and acts as a proxy for said first service;" That is, a second service, such as an application service provider (ASP), sends a message to a mapped service. The mapped service is an entity account-specific representation of the first service and acts as a proxy for the first service. Thus, the second service, which is sending the message, does not need to know the address or identity of the first service. All the second service needs to know is how to access the mapped service that corresponds to the first service (see specification, paragraphs [1173]-[1175]).

The Examiner alleges that this step is anticipated by col. 20, lines 47-52 and col. 21, lines 6-13 of Zombek. The applicants respectfully disagree. The cited sections of Zombek describe how a client device (112) sends a message through a protocol gateway (116) over a network (118b) to a message router (124), which directs the message to a back-end server (122). The protocol gateway (116) supports a specific network access protocol and acts as an interface between a network (114) and wide-area/local-area networks (118a, 118b) (col. 10, lines 11-16). The message includes a server identifier, a service type, and a message type. The protocol gateway forwards the message to the least recently used message router (124), which determines how to route the message over network (118b) to the back-end server (122). Thus, Zombek merely discloses a conventional message routing method. In particular, Zombek does not disclose receiving a message that is being directed to a mapped service. In Zombek the message is sent from a client device to a back-end server whose identity is known through the information included by the client in the message.

Furthermore, step (c) of claim 1, as amended, recites "translating, by said message routing network, said message for delivery to said first service, wherein said translated message includes said identifier and is directed from said mapped service to said first service" That is, the mapped service translates the received message and sends it to the first service. During the translation the same identifier is kept in the message, such that the first service knows with which entity account the translated message is associated. However, the first service sees the message as originating from the mapped service and is not necessarily aware of that the message originated from the second service, depending on what translation mechanisms are used.

The Examiner alleges step (c) is anticipated by col. 32, lines 46-50, col. 20, lines 47-52, and col. 22, lines 22-29 of Zombek. The applicants respectfully disagree. As discussed above, Zombek does not disclose any mapped services. Furthermore, the "HTTP redirector" of Zombek, which was cited as anticipating the translating of the message, is located at the client and is designed to intercept all requests from a browser, package the raw HTTP requests into an intelligent messaging network messages, and transmit them through the intelligent messaging network to the back end server, which is to handle HTTP requests (col. 32, lines 46-50). Thus, the "translation" in Zombek occurs at the client, and it occurs before the message or request in question enters the "network." In contrast, claim 1 requires that the translation be done "by said message routing network." For at least these reasons, claim 1 is neither anticipated, nor rendered obvious by Zombek and it is respectfully requested that the rejection under 35 U.S.C. § 102(e) be removed.

Claim 9 is a *Beauregard* claim corresponding to claim 1, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejection of claim 9 under 35 U.S.C. § 102(e) should be withdrawn.

Claim 10 is directed to a message routing system including a message routing network that enables routing of a message between a first service and a second service. The message is associated with an account that is supported by the second service. The message routing network effects a virtual service through which the first service and the second service communicate. The implementation of the virtual service is supported by a mapping that associates the virtual service with the account. As described in paragraph [1023] of the applicants' specification, the virtual service can act as a proxy to other services. This can be useful, for example, when a business X has a relationship with a business Y, and would like that messages sent to business X's service are redirected to business Y's service. Services can implement redirection through routing scripts that map invocations of the service to invocations of another service, including redirection of replies.

The Examiner alleges that this is shown in col. 22, lines 51-61 of Zombek. The applicants respectfully disagree. The cited section of Zombek discloses the operations of a message router (124) when it receives an incoming message from a client application. If a ServiceID field of the message header portion of the message is set to zero, the router consults a routing table that maps message keys (such as Service Type and Message ID) to the IP address of the proper back-end server. Again, the description in Zombek merely discloses the actions of a message router (124), depending on the type of message that is received. The message router of Zombek does not function as a proxy through which two services communicate. Rather, the

message router (124) of Zombek merely does a one-time determination (through a number of alternative mechanisms) of where to send a message (i.e., to which back-end server) when the message does not contain any explicit back-end server identification. For at least these reasons, it should be clear that the applicants' invention, as defined in claim 10, is neither anticipated nor rendered obvious in view of Zombek, and the rejection of claim 10 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 2-8 all depend from claim 1, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 1, and the rejections of claims 2-8 under 35 U.S.C. § 102(e) should be withdrawn.

Claims 11-14 all depend from claim 10, and are therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 10, and the rejections of claims 11-14 under 35 U.S.C. § 102(e) should be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 15-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zombek in view of U.S. Patent No. 6,470,357 to Garcia et al. (hereinafter Garcia). The applicants respectfully traverse the rejection for the following reasons.

Claim 15 is directed to a message routing method. A proxy service is provided by the message routing network for messages transferred between a first application service provider and a second application service provider in the message routing network. The first application service provider and the second application service provider provide application services for an enterprise. The proxy service enables the first application service provider to send information on behalf of the enterprise to the second application service provider without the first application service provider and the second application service provider having knowledge of each other.

The Examiner alleges that the provision of the proxy service is shown by the Proxy IP/Port (204) and the HTTP Redirector (106) of Zombek. The applicants respectfully disagree. Both the Proxy IP/Port (204) and the HTTP Redirector (106) of Zombek are located in the client, as can be seen in FIG. 2. In the applicants' invention, on the other hand, the proxy service is provided "by the message routing network," as required by claim 15. Furthermore, these application service providers, as defined in claim 15, are "providing application services for an enterprise." Zombek does not disclose any messaging, or proxy services involved in messaging, between application service providers. Nor does Zombek disclose the claimed limitation of "said proxy service enabling said first application service provider to send information on behalf of

said enterprise to said second application service provider." Zombek merely discloses sending messages from a client device to a back-end server, through a proxy located in the client device.

Furthermore, the Examiner acknowledges that Zombek does not teach sending information "without said first application service provider and said second application service provider having knowledge of each other," and relies on Garcia to disclose this claim limitation. Garcia discloses a system and method for routing messages between applications in a telecommunications management network. The cited section of Garcia states that it allows messages to be routed between telecommunications management applications "without requiring the sending application to know which application should receive the message and the characteristics of the application that will receive the message" (col. 1, lines 38-41). However, Garcia discloses an Enhanced Directory Service (EDS), which "provides the routing information to the requesting application or to a dispatcher process...that routes the message between requesting and requested applications" (col. 5, lines 36-39). Thus, during the routing process of Garcia, the sending application becomes aware of the receiving application's identity. Therefore Garcia does not cure this deficiency of Zombek.

In order to establish a *prima facie* case of obviousness, the Examiner must show that the combination of Zombek and Garcia teaches or suggests all the claim limitations, which the Examiner has failed to do, as is clear from the discussion above. Furthermore, the Examiner needs to show a reasonable expectation of success, which the Examiner has failed to do since he has not shown that the combination of the two references would result in the invention, as defined by claim 15. Finally, the Examiner must show a motivation to combine Zombek and Garcia. The Examiner's motivation that it "would increase the efficiency of Zombek's system by allowing application to avoid the time consuming task of tracking which application is performing which function" (Office Action, page 8) is insufficient, since it is not clear that Garcia actually would increase the efficiency, especially not since Garcia requires a number of searches in the EDS database during the routing of the message from the sending application to the receiving application. For at least these reasons, the rejection of claim 15 under 35 U.S.C. § 103(a) is unsupported by the cited art and should be withdrawn.

Claim 16 depends from claim 15, and is therefore neither anticipated nor obvious for at least the reasons discussed above with respect to claim 15, and the rejection of claim 16 under 35 U.S.C. § 103(a) should be withdrawn.

Conclusion

The applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,
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